

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

| | |
|---|-------------------------------------|
| IN RE: JOSEPH COLUCCI | Case No. 19-16972-amc Chapter 13 |
| Freedom Mortgage Corporation, Movant | |
| vs. | |
| JOSEPH COLUCCI, Debtor | |

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

FREEDOM MORTGAGE CORPORATION has filed a Motion to Allow Loan Modification and for Approval to Execute and Record Partial Claim Agreement with the Court.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the Court to grant relief sought in the motion or if you want the Court to consider your views on the motion, then on or before December 30, 2021 you or your attorney must do all of the following:

(a) file an answer explaining your position at:

Clerk's Office, U.S. Bankruptcy Court
900 Market Street, Suite 400
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

Brock and Scott, PLLC
8757 Red Oak Boulevard, Ste 150
Charlotte, NC 28217

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the approval requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashely Chan on January 11, 2022 at 11:00 a.m., in Courtroom #4, United States Bankruptcy Court, 900 Market Street, Suite 400, Philadelphia, PA 19107. Unless the Court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorneys named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2830 to find out whether the hearing has been cancelled because no one filed an answer.

This is the 14th day of December 2021.

Brock and Scott PLLC

/s/ Andrew Spivack

Andrew Spivack

(Bar No. 84439)

Attorney for Creditor

BROCK & SCOTT, PLLC

302 Fellowship Road, Suite 130

Mount Laurel, NJ 08054

Telephone: 844-856-6646 x3017

Facsimile: 704-369-0760

E-Mail: PABKR@brockandscott.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE:
JOSEPH COLUCCI

Case No. 19-16972-amc
Chapter 13

Freedom Mortgage Corporation,
Movant

vs.

JOSEPH COLUCCI,
Debtor

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Notice Of Hearing And Motion to Allow Loan Modification and for Approval to Execute and Record Partial Claim Agreement has been electronically served or mailed, postage prepaid on this day to the following:

JOSEPH COLUCCI
9315 RISING SUN AVE
PHILADELPHIA, PA 19115-3716

Law Office of Michael Schwartz
707 Lakeside Office Park
Southampton, PA 18966
msbankruptcy@verizon.net

Kenneth E. West, Bankruptcy Trustee
Chapter 13 Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

United States Trustee, US Trustee
200 Chestnut Street
Suite 502
Philadelphia, PA 19106

USTPRegion03.PH.ECF@usdoj.gov

December 13, 2021

/s/ Andrew Spivack

Andrew Spivack

(Bar No. 84439)

Attorney for Creditor

BROCK & SCOTT, PLLC

302 Fellowship Road, Suite 130

Mount Laurel, NJ 08054

Telephone: 844-856-6646 x3017

Facsimile: 704-369-0760

E-Mail: PABKR@brockandscott.com